



*Environment, Safety, Health & Quality*  
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*National Nuclear Security Administration*  
Los Alamos Site Office, A316  
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Date: December 9, 2010  
Refer To: ENV-RCRA-10-239  
LAUR: 10-08215

Ms. Sonia Hall  
U.S. Environmental Protection Agency, Region 6  
Water Quality Protection Division  
Planning and Analysis Branch (6 EN)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Dear: Ms. Hall:

**SUBJECT: LOS ALAMOS NATIONAL LABORATORY, NPDES PERMIT NO.  
NM0028355, NOTICE OF PLANNED CHANGE AT NPDES OUTFALL 051**

The National Pollutant Discharge Elimination System (NPDES) Permit No. NM0028355 for the National Nuclear Security Administration (NNSA) and Los Alamos National Security, LLC (LANS) requires the permittee(s) to notify the U. S. Environmental Protection Agency (EPA) regarding any physical alterations or additions to the permitted facility that could significantly change the nature or increase the quantity of pollutants discharged (see Part III.D.1.a. *Reporting Requirements*).

The Radioactive Liquid Waste Treatment Facility (RLWTF) plans to add hardness to the facility effluent waters. Hardness will be added by the addition of soluble calcium and/or magnesium salts to the RLWTF process water or effluent water. The purpose of adding hardness to the water is to reduce the toxicity of copper and zinc to the *Daphnia Pulex* organism. These metals have been shown to be major contributors to the failed Whole Effluent Toxicity (WET) tests at Outfall 051.

The RLWTF treatment processes reduce the hardness of the effluent water to essentially zero hardness by the use of the clarifier (which operates as a softener) and the reverse osmosis treatment operation. This reduction of hardness exacerbates the toxicity of the copper and zinc to the *Daphnia Pulex* organism.

The hardness salts will be added either to the North or South Frac Tanks or to Tank 38. The hardness of the RLWTF effluent water will be adjusted to approximately 75 mg/L as CaCO<sub>3</sub> using the calcium and/or magnesium salts.

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A copy of the revised treatment schematic is enclosed (see Enclosure 1).

Please contact Marc Bailey at (505) 665-8135 or Mike Saladen at (505) 665-6085 of the Water Quality and RCRA Group (ENV-RCRA) if you have questions or need additional information.

Sincerely,



Anthony R. Grieggs  
Group Leader  
Water Quality & RCRA Group (ENV-RCRA)  
Los Alamos National Security, LLC

Sincerely,



Gene Turner  
Environmental Permitting Manager  
Environmental Projects Office  
Los Alamos Site Office  
National Nuclear Security Administration

ARG:GT:MB/lm

Enclosure: a/s

Cy: Brent Larsen, USEPA Region 6, Dallas, TX, w/enc.  
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Glenn Saums, NMED/SWQB, Santa Fe, NM, w/enc.  
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Cindy Blackwell, LC-LESH, w/o enc., A187  
ENV-RCRA File, w/enc., K490  
IRM-RMMSO, w/enc., A150

**ENCLOSURE 1**

Rad Liquid Waste Collection  
System (RLWCS) Influent